

[REDACTED]

191. On December 16, 2018, Cecile de Jongh wrote to Epstein that Governor Albert Bryan had suggested two schools, Coral Reef Academy and Junior Achievement, to which Epstein could make a \$50,000 donation. JPMC Ex. 202; JPMC Ex. 203 at 162:20-167:1.

192. On December 20, 2018, Cecile de Jongh wrote to Epstein that Governor Albert Bryan had requested that Epstein donate \$30,000 to the USVI Little League. JPMC Ex. 204.

193. In 2010, one of Epstein's USVI-based businesses, Financial Trust Company, Inc. ("FTC") donated \$3,500 to the Virgin Islands Police Department. JPMC Ex. 205 at -6070.

194. In August 2012, Epstein was asked to provide funding for two USVI police officers to attend a homicide investigation training program in New York. He wrote to Cecile de Jongh that he "always would like to support these things" but that "in the past" it had been "looked upon with suspicioun [sic]." Cecile de Jongh responded: "Suspicion locally? My thought was that this would be ok because it is specifically homicide training." Epstein responded "face to face." JPMC Ex. 206.

195. Over multiple election cycles, Epstein donated \$5,400, the maximum amount allowed, to the campaign of Congresswoman Stacey Plaskett, the Delegate to the United States House of Representatives from the USVI. JPMC Ex. 207 at 148:8-17; JPMC Ex. 244.

196. Congresswoman Plaskett previously worked for the USVI Economic Development Authority ("EDA") and for a law firm that represented Epstein related to his USVI businesses. JPMC Ex. 207 at 14:24-15:5; 86:4-24; JPMC Ex. 208 at 101:4-13.

197. Cecile de Jongh asked Epstein to donate money to Congresswoman Stacey Plasket. JPMC Ex. 208 at 189:4-12.

198. Cecile de Jongh asked Epstein to donate \$13,000 to the Democratic Party on behalf of Congresswoman Stacey Plaskett. JPMC Ex. 208 at 195:2-8.

[REDACTED]

199. Congresswoman Plaskett also asked Epstein to donate the maximum amount to the Democratic Congressional Campaign Committee (“DCCC”), which was approximately \$30,000. JPMC Ex. 207 at 219:7-221:13.

200. Epstein attempted to donate \$30,000 to the DCCC, but the donation was returned after Epstein failed to meet the DCCC’s vetting requirements. JPMC Ex. 207 at 226:10-227:12; JPMC Ex. 208 at 195:17-197:9.

201. Epstein requested that Congresswoman Plaskett’s campaign keep his donations anonymous. JPMC Ex. 209.

202. On June 19, 2014, Cecile de Jongh emailed Epstein that his “help [was] needed” because “[w]e are trying to get Stacey Plaskett elected to Congress.” She further stated that “we would have a friend in Stacey” and asked Epstein if “any of [his] friends would give to her campaign.” JPMC Ex. 210.

203. Epstein requested, through Cecile de Jongh, that his employees and other individuals donate to Congresswoman’s Plaskett’s campaign. JPMC Ex. 210; JPMC Ex. 208 at 191:1-20, 194:2-195:1.

204. Epstein and his employees donated over \$30,000 to Congresswoman Plaskett’s campaigns across three congressional election cycles. JPMC Ex. 207 at 303:17-305:20.

205. [REDACTED]

[REDACTED]

[REDACTED]

” JPMC Ex. 211.

206. On October 24, 2014, Cecile de Jongh wrote to Epstein to confirm “that STC will send \$13k to the Democratic Party for the benefit of Stacey Plaskett.” JPMC Ex. 212.

[REDACTED]

207. On October 17, 2014, Cecile de Jongh and Epstein exchanged emails regarding a \$15,000 donation from Epstein's personal account to the St. Croix District Democratic Party. JPMC Ex. 213; JPMC Ex. 208 at 187:18-189:3.

208. As part of that email thread, on October 16, 2014, Cecile de Jongh wrote that "[future Governor] Kenn Mapp and [Senator] Celestino White would like to see you." JPMC Ex. 213.

209. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 214; JPMC Ex. 215.

210. On February 16, 2018, Cecile de Jongh emailed Epstein regarding upcoming elections and candidates and stated that his "best bet is to give wide but nominal support in the primary to solidify relationships and then strongly support the winner of the primary going into the general election." JPMC Ex. 216.

211. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 217.

[REDACTED] or

212. [REDACTED]

[REDACTED] JPMC Ex. 218.

213. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 219.

214. On November 10, 2014, Cecile de Jongh wrote to Epstein that the “Mapp campaign is going to take the \$ that you gave to attack John” and asked: “Can we stop payment on the check to send a message?” JPMC Ex. 220.

215. On September 1, 2016, Epstein asked to prepare a check to donate \$75,000 to a super PAC associated with Governor Kenneth Mapp. JPMC Ex. 221; JPMC Ex. 208 at 197:17-198:20.

216. On December 18, 2014, Sebastiano Palewonsky Cassinelli wrote to Cecile de Jongh “[r]egarding a contribution to the Mapp-Potter Inaugural Committee” and stated the Committee “would welcome any donation that Mr. Epstein would be so inclined to make.” Cecile de Jongh then wrote to Epstein to confirm that he wanted “to donate \$10,000 to the Mapp-Potter Inaugural committee and that it should come from Southern Trust.” JPMC Ex. 222; JPMC Ex. 223 at 101:25-103:3.

217. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 315; JPMC Ex. 203 at 172:11-176:5.

[REDACTED]

218. [REDACTED]

[REDACTED]

JPMC Ex. 225.

219. In January 2014, at the request of Cecile de Jongh, Epstein donated \$15,000 to the Special Events Fund for Governor John de Jongh related to Governor de Jongh's State of the Territory reception. JPMC Ex. 226; JPMC Ex. 208 at 186:3-187:17; JPMC Ex. 224 at 101:6-103:21.

220. Epstein paid [REDACTED] to USVI Senator Celestino White to consult on changing the name of one of Epstein's islands. JPMC Ex. 228; JPMC Ex. 208 at 102:6-13, 106:20-107:13; JPMC Ex. 229.

221. From January 2007 to January 2015, Cecile de Jongh was the First Lady of the USVI. JPMC Ex. 208 at 16:9-17:16.

222. Cecile de Jongh was the manager for two of Epstein's USVI-based businesses, FTC and STC. JPMC Ex. 224 at 39:25-40:11.

223. [REDACTED]

[REDACTED] JPMC Ex. 230.

224. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 231; JPMC Ex. 230; JPMC Ex. 233; JPMC Ex. 234; JPMC Ex. 224 at 142:3-144:5.

225. On September 21, 2010, Cecile de Jongh wrote to Epstein that she and Governor John de Jongh "have put money into the campaign based on what [they] thought was going to happen with the tuition payments." JPMC Ex. 235; JPMC Ex. 224 at 144:13-145:24.

[REDACTED]

226. On September 25, 2015, Epstein wrote to Cecile de Jongh to offer to lend money to Governor John de Jongh “so he immediatly has it [sic]” in connection with a criminal case brought against Governor de Jongh. Epstein stated he would “play any role in this you guys like” and stated he would “gladly be on thephone (anonymouse) with john quinn and the prosecutor offering suggestions. [sic]” JPMC Ex. 236; JPMC Ex. 208 at 159:3-160:25.

227. [REDACTED]

[REDACTED]

[REDACTED]

JPMC Ex. 237.

228. Epstein loaned Cecile de Jongh and John de Jongh \$200,000 related to a criminal case brought against Governor John de Jongh. JPMC Ex. 208 at 89:23-92:7; JPMC Ex. 224 at 39:15-21; 82:7-18; 292:22-298:24.

229. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 238.

230. [REDACTED]

[REDACTED] JPMC

Ex. 239.

231. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 240; JPMC Ex. 241.

232. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 242. On February 11, 2015, Cecile de Jongh wrote to Epstein stating he “might want to consider putting [USVI Senator] Celestino [White] on some sort of monthly retainer” because it would “get [Epstein] his loyalty and access.” JPMC Ex. 243; JPMC Ex. 208 at 107:20-109:12.

233. From 2002 through 2006, Financial Trust Company “spent more than \$5.4 million into the local economy.” JPMC Ex. 245 at VI-JPM-000021922.

234. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 247.

235. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 247; JPMC Ex. 248.

236. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 249.

B. Epstein Gave USVI Government Officials And Entities Non-Monetary Benefits

237. Cecile de Jongh stayed at Epstein's apartment in New York for about a month in 2017. JPMC Ex. 250; JPMC Ex. 208 at 42:17-24.

238. In February 2017, Epstein wrote Cecile de Jongh to state that "the vi govt is desperate for cash" and asked if former Governor John de Jongh knew of USVI government properties that could serve as collateral for a \$50 million dollar loan from Epstein. Cecile de Jongh stated that she would "get a list of GOVI properties." JPMC Ex. 251; JPMC Ex. 208 at 202:23-206:2; JPMC Ex. 224 at 342:14-346:19.

239. Governor Kenneth Mapp testified that he discussed eCommerce issues with Epstein and asked him for assistance in "spreading the word that the Virgin Islands had" a "unique attribute that it was pushing for business investment" regarding "a redundant platform that was tied in by fiber-optic and undersea cables into Florida and into New York" that could benefit businesses. JPMC Ex. 223 at 119:2-120:7.

240. Governor Mapp testified that he sought "Epstein's advice about how to increase business investment in the Virgin Islands." JPMC Ex. 223 at 120:21-122:7.

[REDACTED]

241. Governor Mapp testified that he sought Epstein’s advice on “how to be successful in issuing what was some really critically-needed bonds for financing some critical financing needs of the territory.” JPMC Ex. 223 at 40:2-42:21.

242. Governor Mapp testified that he sought Epstein’s assistance in legislative efforts to allow EDC beneficiaries to repatriate their income to make USVI’s EDC program more attractive. He further testified that William Blum, one of Epstein’s attorneys, helped draft legislation regarding these repatriation efforts. JPMC Ex. 223 at 61:22-65:23.

243. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 246.

C. USVI Had Knowledge Of Epstein’s Crimes

244. In October 2007, Page Six published an article titled “Epstein’s Tropic Isle of Babes,” which stated that the “sordid sex scandals surrounding Jeffrey Epstein are making waves in the Caribbean, where the billionaire owns a private 900-acre getaway and has deep financial ties to the governor of the U.S. Virgin Islands.” The article further stated that Epstein “regularly ferried boatloads of young women there.” JPMC Ex. 252.

245. USVI’s 2010 sex offender file on Epstein contained a copy of a Daily Beast article titled “Billionaire Pedophile Goes Free” that Florida law enforcement faxed to USVI DOJ in July 2010. JPMC Ex. 253 at 74:24-75:16; JPMC Ex. 254 at 12215. Among other things, it

[REDACTED]

stated that Epstein had a “private Caribbean island,” that victims made allegations about trips “out of state and abroad on Epstein’s private jets” that would have been evidence of sex trafficking, that the FBI’s investigation reached as far back as 2001, and that the FBI had identified roughly 40 victims. JPMC Ex. 253 at 75:16-76:21; JPMC Ex. 254 at 12215.

246. The Government’s 30(b)(6) witness on sex offender monitoring, Ms. Inais Borque, testified that the Government was aware of the contents of Epstein’s sex offender files, including the Daily Beast article. JPMC Ex. 253 at 75:17-76:21.

247. On May 1, 2009, Jane Doe No. 102 filed a lawsuit in the Southern District of Florida alleging that Epstein was transporting victims to the USVI. JPMC Ex. 255.

248. On January 13, 2015, the Guardian published an article titled “Jeffrey Epstein’s Donations to Young Pupils Prompts US Virgin Islands Review.” It stated that the USVI was going to “review its corporate sponsorships after it emerged that Jeffrey Epstein, the convicted sex offender and friend to Prince Andrew, gave gifts to school pupils and financed events for young children.” The article further stated that a woman had alleged that she was “made to engage sexually with Andrew at Epstein’s Virgin Islands property.” JPMC Ex. 201 at 1, 2.

249. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 256, JPMC Ex. 257; JPMC Ex. 258 at 42:10-44:02.

250. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. JPMC Ex. 259 at 61109. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 259 at 61132-61144.

251. On January 26, 2017, Jane Doe 43 filed a lawsuit in the Southern District of New York against Epstein and others alleging that she was required to perform sexual acts on Epstein in the USVI and that on one occasion after suffering verbal abuse and threats by Epstein and others she attempted to escape from his private island only for a search party to locate her and physically return her to the main house on the island. JPMC Ex. 260 ¶¶ 42, 46.

252. [REDACTED]

[REDACTED] JPMC Ex. 261 at 222:18-223:12.

253. [REDACTED]

[REDACTED] JPMC Ex. 262 at 74:19-76:25.

254. [REDACTED]

[REDACTED] JPMC Ex. 263 at 127:13-17.

255. [REDACTED]

[REDACTED]

Ex. 263 at 131:3-132:4.

D. USVI's Lax Sex Offender Monitoring Of Epstein Facilitated His Crimes

256. [REDACTED]

[REDACTED] JPMC Ex. 261 at 207:9-

208:24.

[REDACTED]

257. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 264 at 159:9-162:2,
164:3-171:17; JPMC Ex. 262 at 75:2-76:25.

258. [REDACTED]

[REDACTED] JPMC Ex. 264 at 163:07-16. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 264 at
164:3-171:17; JPMC Ex. 262 at 75:2-76:25.

259. [REDACTED]

[REDACTED] JPMC Ex. 264 at 164:3-170:3.

260. [REDACTED]

[REDACTED] JPMC Ex. 261 at 126:7-129:2.

261. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 265.

262. Governor John de Jongh testified that he emailed the parole request to the Attorney General and told the First Lady to speak directly to the Attorney General about it. JPMC Ex. 224 at 227:19-25, 228:12-229:7.

[REDACTED]

263. First Lady Cecile de Jongh testified that she never spoke to the Attorney General about it but that the Governor did and relayed to her how Epstein should proceed as to the parole request. JPMC Ex. 208 at 163:1-164:9.

264. [REDACTED]
[REDACTED] JPMC Ex. 266 at 39:20-40:16.

265. On May 15, 2011, Ms. de Jongh forwarded an email to Epstein with “suggested language” for USVT’s Sex Offender Registration and Notification Act (SORNA) legislation. The original sender information is cutoff, but the author writes: “I considered the language you shared with me. I believe this language may be best. We need to be able to know whether a person is at the address or not. To waive the notice requirement all together will not be acceptable to the federal DOJ program managers. Remember they must review and determine if we are in compliance. This is the suggested language; will it work for you?” JPMC Ex. 267 at 024493. Epstein replied that “we should add out of country for more than 7 days, otherwise I could not go for a day trip to Tortola ,at the last minute.” JPMC Ex. 267. Ms. de Jongh replies that “This needs to be settled by Thursday because J goes away for a week and AG needs to submit by June 1. Don’t want to email back and forth.” JPMC Ex. 267.

266. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] JPMC Ex. 268.

267. [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED]

JPMC Ex. 269; JPMC Ex. 270; JPMC Ex. 271; JPMC Ex. 266 at 9:8-22.

268. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. JPMC Ex. 272.

269. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 227;

JPMC Ex. 273.

270. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 273.

271. [REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 273.

272. Ms. Monica Carbon, legal counsel to the Attorney General, stated that at the time she was not concerned about receiving input from Ms. Hodge on the sex offender legislation because she “knew that anything submitted had to be approved by US DOJ.” JPMC Ex. 274; JPMC Ex. 261 at 54:14-55:14.

273. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 261 at 294:10-296:7.

274. First Lady de Jongh testified that she spoke to her husband, Governor de Jongh, about Epstein’s preferences for the SORNA legislation. JPMC Ex. 208 at 165:19-166:24. She testified that she never spoke with the Attorney General about Epstein in relation to the legislation, but her husband did. JPMC Ex. 208 at 165:19-166:24.

275. Governor de Jongh initially testified that he never spoke to the First Lady or the Attorney General regarding Epstein and the proposed legislation. JPMC Ex. 224 at 245:10-12, 242:25-244:07. After being confronted with documents, he acknowledged speaking to both Ms. de Jongh and the Attorney General regarding Epstein and the proposed legislation. JPMC Ex. 224 at 270:17-278:7.

276. [REDACTED]

[REDACTED] JPMC Ex. 266 at 178:6-179:2.

277. [REDACTED]

[REDACTED]

JPMC Ex. 266 at 173:5-25.

[REDACTED]

278. Ms. de Jongh testified that Epstein's team and USVI DOJ reached an agreement on the language of the amendments, but that Senator Russell changed his mind, and also that Attorney General Frazer did not push hard enough for the agreed language. JPMC Ex. 208 at 177:2-180:11.

279. On June 28, 2012, the legislature of the USVI passed Act No. 7372, an act amending chapter 86 of title 14 of the Virgin Islands Code, which contains the laws of the USVI regarding the monitoring and tracking of sex offenders within USVI. JPMC Ex. 275 at 65. Governor de Jongh approved the bill on July 18, 2012. *Id.* at 66.

280. The Act deleted and replaced subsection 1724(b)(4) with the following language: "All sex offenders required to register in this jurisdiction shall appear in person at the [DOJ] at least twenty one (21) calendar days prior to any intended travel outside of the United States and provide information about their intended travel as may be required by the Attorney General; provided, however, that the Attorney General may at his discretion reduce this twenty-one (21) day notice requirement if a sex offender requests such a reduction and provides information in support of the request." JPMC Ex. 275 at 37.

281. It also deleted and replaced subsection 1726(2)(b)(16) with the following language: "Within twenty-one (21) days prior to Travel for 7 days or more, the sex offender shall provide the following information; provided, however, that the Attorney General may at his discretion reduce this twenty-one [(21)] day notice requirement if a sex offender requests such a reduction and provides information in support of the request. (i) identifying information of the temporary lodging locations including addresses and names, and (ii) the dates the sex offender will be staying at each temporary lodging location. (iii) the Attorney General at his discretion

[REDACTED]

may require other information in lieu of the above information upon the request of a sex offender.” JPMC Ex. 275 at 49.

282. On July 1, 2012, Ms. de Jongh sent Epstein an email with the subject line “Next steps.” She stated: “I know this was a horrible week and I am really sorry about how things panned out . . . However, all is not lost and [] we will figure something out by coming up with a game plan to get around these obstacles . . . We will need to work through Dowe and White to get this accomplished. In the mean time, we will work with Vincent to give the discretion for status quo for you – that’s the least he can do.” JPMC Ex. 276.

283. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 277.

284. On December 14, 2012, another amendment to chapter 86 of title 14 passed, amending section 1724(b) as follows: “striking in paragraph (4) ‘may be required by the Attorney General’ and inserting ‘provided in § 1726; however, a sex offender who provides reasonable and reliable proof satisfactory to the Department of Justice, that he travels frequently outside the United States for work or other legitimate purposes, or a sex offender who travels outside the United States for emergency situations, shall notify the Department of Justice prior to departure, by telephone or in writing, of travel outside the United States for periods of 48 hours or less, and shall notify the Department of Justice in writing at least 24 hours before traveling outside of the United States for periods of more than 48 hours, and, in any such case, shall notify the Department of Justice in writing upon the sex offender's return to this jurisdiction.’” JPMC Ex. 278 at 2.

[REDACTED]

285. It also amended 1726(b) by “striking the language in (16) in its entirety and inserting new language that read as follows: ‘A sex offender who provides reasonable and reliable proof satisfactory to the Department of Justice, that he travels frequently outside the United States for work or other legitimate purposes, and a sex offender who travels outside the United States for emergency situations, shall notify the Department of Justice prior to departure, by telephone or in writing, of travel outside the United States for periods of 48 hours or less, and shall notify the Department of Justice in writing at least (24) hours before traveling outside of the United States for periods of more than (48) hours, and, in any such case, shall notify the Department of Justice in writing upon the sex offender’s return to this jurisdiction; however, the Attorney General may, at his discretion, reduce the 21-day notice requirement, if a sex offender requests such a reduction and provides information in support of the request, satisfactory to the Department of Justice. The information must include: identifying information of the temporary lodging locations, including addresses and names, or, in the case of a sex offender who provides reasonable and reliable proof satisfactory to the Department of Justice, that he travels for work or other legitimate purposes frequently, reliable information regarding general travel locations and areas of work in lieu of specific addresses, and contact telephone information at which the sex offender can be contacted without unreasonable delay at all times while traveling away from the Virgin Islands; and (ii) The dates the sex offender will be staying at each temporary lodging location, or in such general locations and areas of work. . . .’” JPMC Ex. 278 at 2.

286. In a July 25, 2012 letter, Attorney General Frazer informed Ms. Maria Hodge that he was granting Epstein a waiver of the 21-day notice requirement when he traveled outside of USVI. The letter states that notice must be given to the DOJ no less than 72 hours before travel

[REDACTED]

and that it may be given in person, by facsimile correspondence which is signed by him, or by e-mail with an electronic signature. JPMC Ex. 279 at -12263.

287. In an August 14, 2012 letter, Attorney General Frazer informed Ms. Hodge that “[a]fter careful review of your letter giving additional information to support . . . Jeffrey Epstein’s request” he was allowing Epstein to notify the DOJ of his intention to travel out of USVI within 24 hours prior to departure; to notify when he was staying in one of his stateside homes and to provide a current list and addresses of each of his stateside homes; when staying in a non-private lodging, to provide the specifics of the name, city and address of the establishment; and when he was staying in the home of an associate, to notify the department of the city and state or country in which he is temporarily staying and his period of stay in the jurisdiction. JPMC Ex. 279 at -12275.

288. [REDACTED]

[REDACTED] JPMC Ex. 261 at 306:8-21; 450:14-19. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 261 at 306:8-21.

289. [REDACTED]

[REDACTED] JPMC Ex. 266 at 247:12-248:3.

290. [REDACTED] JPMC Ex. 266 at 43:19-20; 243:11-13.

291. [REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 266 at 199:3-14; 252:23-253:18.

[REDACTED]

292. Ms. Carbon does not recall “doing any research or work on this request for a waiver.” JPMC Ex. 274. [REDACTED]

[REDACTED] JPMC Ex. 261 at 61:19-63:11.

293. In a March 14, 2019 letter, Former Attorney General Thomas-Jacobs wrote to Epstein that “while provisions were granted in the past” USVI DOJ was now requiring notification of any travel outside of the U.S. Virgin Islands in person at USVI DOJ when Epstein was in USVI at least 21 calendar days prior to the travel. JPMC Ex. 280 at -12328; JPMC Ex. 263 at 39:23-40:15.

294. [REDACTED]

[REDACTED] JPMC Ex. 263 at 39:3-20; 40:17-23. [REDACTED]

[REDACTED] JPMC Ex. 263 at 23:21-24:2; 40:22-41:6.

295. [REDACTED]

[REDACTED]

[REDACTED]. JPMC Ex. 262 at 214:14-216:4.

296. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] JPMC Ex. 264 at 104:7-16; JPMC Ex. 262 at 173:19-174:13.